

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE MF GLOBAL HOLDINGS
LIMITED SECURITIES LITIGATION

THIS DOCUMENT RELATES TO:

All Securities Actions
(*DeAngelis v. Corzine*)

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: Civil Action No. 1:11-CV-07866-VM
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: ECF CASE
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**NOTICE OF LEAD PLAINTIFFS' MOTION FOR
(I) PRELIMINARY APPROVAL OF UNDERWRITER SETTLEMENT,
(II) CERTIFICATION OF THE UNDERWRITER SETTLEMENT CLASS, AND
(III) APPROVAL OF NOTICE TO THE UNDERWRITER SETTLEMENT CLASS**

TO: All Counsel of Record

PLEASE TAKE NOTICE that upon the Stipulation and Agreement of Settlement with Certain Underwriter Defendants dated as of November 25, 2014 (the "Underwriter Stipulation")¹, attached hereto as Exhibit 1; the accompanying memorandum of law; and all other papers and proceedings herein, Lead Plaintiffs the Virginia Retirement System and Her Majesty The Queen In Right Of Alberta, on behalf of themselves, the other named plaintiffs in the Action, and the other members of the Underwriter Settlement Class, hereby move this Court, under Rule 23 of the Federal Rules of Civil Procedure, for an order: (i) preliminarily approving the proposed Underwriter Settlement; (ii) certifying the proposed Underwriter Settlement Class, certifying Lead Plaintiff the Virginia Retirement System as class representative for the Underwriter Settlement Class, and appointing Co-Lead Counsel Bernstein Litowitz Berger & Grossmann LLP and Bleichmar Fonti Tountas & Auld LLP as class counsel for the Settlement Class; (iii) approving the form and manner of giving notice of the proposed Underwriter

¹ All capitalized terms used herein shall have the meanings provided in the Underwriter Stipulation.

Settlement to Underwriter Settlement Class Members; and (iv) scheduling a hearing on final approval of the Underwriter Settlement. Attached hereto as Exhibit 2 is the [Proposed] Order Preliminarily Approving Proposed Settlement with Certain Underwriter Defendants and Providing for Notice and its exhibits.

Dated: December 11, 2014
New York, New York

Respectfully submitted,

**BERNSTEIN LITOWITZ BERGER
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/s/ Salvatore J. Graziano

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and the Underwriter Settlement Class***

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